

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

CURTIS GIOVANNI FLOWERS;

Plaintiff,

v.

DOUG EVANS, in his individual capacity,
JOHN JOHNSON, in his individual capacity,
WAYNE MILLER, in his individual capacity,
and JACK MATTHEWS, in his individual
capacity;

Defendants.

Civil Action No. 4:21-cv-00110-NBB-JMV

**UNOPPOSED SECOND MOTION FOR EXTENSIONS OF TIME
REGARDING BRIEFING ON DEFENDANT JOHN JOHNSON’S
MOTIONS FOR ABSOLUTE OR QUALIFIED IMMUNITY AND JOINDER**

In light of ongoing settlement discussions, Curtis Giovanni Flowers (“Plaintiff” or “Mr. Flowers”), by and through counsel of record, respectfully moves this Court for an agreed extension of the deadlines for Mr. Flowers to respond to Defendant John Johnson’s Motion for Absolute or Qualified Immunity, and request for Joinder, and states:

1. On December 1, 2021, Mr. Johnson filed an answer to the Complaint, ECF No. 33. On August 2, 2022, Mr. Johnson filed a motion for absolute or qualified immunity, ECF No. 37 and joinder to Defendant Doug Evans’s Motion to Dismiss, ECF No. 39.

2. Mr. Flowers moved for a first extension of time on August 9, 2022, ECF No. 41.

3. This Court granted that extension on August 15, 2022, ECF No. 42.

4. Plaintiff and Defendants have been engaged in recent and ongoing settlement negotiations in this matter that could resolve the case in its entirety.

5. Plaintiff respectfully requests that this Court extend the time for Plaintiff to respond to the motion and joinder to September 29, 2022. Plaintiff does not anticipate any further extensions.

6. Plaintiff has conferred with counsel for Mr. Johnson, who does not oppose this extension.

WHEREFORE, Mr. Flowers respectfully requests that this Court issue an order extending the time for Mr. Flowers to file his responses to September 29, 2022. A proposed order is being submitted.

Dated: September 13, 2022

Respectfully submitted,

By: /s/ Robert B. McDuff.

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Counsel for Plaintiff Curtis Giovanni Flowers

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

THIS the 13th day of September, 2022.

By: /s/ Robert B. McDuff

Robert B. McDuff (MS Bar No. 2532)